

## **REMARKS**

### **I. INTRODUCTION**

Claims 12 and 31 have been amended. No new matter added has been added. Thus, claims 12-31 remain pending in the present application. In view of the above amendments and the following remarks, it is respectfully submitted that all of the presently pending claims are allowable.

### **II. THE 35 U.S.C. § 103(a) REJECTIONS SHOULD BE WITHDRAWN**

The Examiner has rejected claims 12-26 and 29-31 under 35 U.S.C. § 103(a) as unpatentable over U.S. Pat. No. 6,415,341 to Fry, Sr. et al. ("the Fry patent"). (See 2/23/06 Office Action, pp. 2-4).

The Fry patent describes a point-of-sale (POS) system utilizing a protocol converter/print share device to interface with peripheral devices and a POS terminal. (See the Fry patent, col. 4, lines 17-20). The POS terminal is connected via its RS-485 I/O channel with the protocol converter. (Id. at col. 5, lines 16-19). The protocol converter operably converts the RS-485 commands from the POS terminal to RS-232 commands to be sent to a printer. (Id. at col. 5, lines 27-29). The protocol converter can further format commands from the POS terminal to control the peripheral devices attached to a personal computer (PC) client. (Id. at col. 5, lines 31-34).

Claim 12 of the present application is directed to a distributive service system comprising "a register device for conducting a transaction" and "a first peripheral device configured to communicate information regarding the transaction according to a first protocol" and "a protocol converter coupled to the register device and the first peripheral device, the protocol converter configured to receive information from the first peripheral device according to

the first protocol and communicate the information using TCP/IP” in combination with “a transaction controller coupled to the protocol converter and the register device, the transaction controller operable to facilitate communication between the register device and the protocol converter when the first peripheral device replaces a second peripheral device communicating in a second data format that is incompatible with a first data format used by the first peripheral device, wherein the register device continues to transmit data to the first peripheral device using the second data format and the first peripheral device responds to the register device using the first data format.”

In contrast to claim 12, the protocol converter described by the Fry patent is not a transaction controller which facilitates communication “between the register device and the protocol converter when the first peripheral device replaces a second peripheral device,” as recited in claim 12. The protocol converter of the Fry patent is capable of emulating the operation of a peripheral with which the POS terminal is compatible (i.e., a legacy device). (See the Fry patent, col. 5, lines 39-43). However, when a non-legacy device that is incompatible with the POS terminal is used, the protocol converter of the Fry patent does not attempt to facilitate communications by converting data formats between the POS terminal and the non-legacy device. This is because the POS terminal is already capable of accessing legacy device features supported by the non-legacy device. Thus, while the present invention is concerned with providing support for the functionality of the replaced device, the Fry patent assumes that the POS terminal is capable of accessing the legacy features on the non-legacy device, and is not concerned with the problem of supporting the features of the replaced device. Instead, the Fry patent is concerned with providing enhanced functionality and states that when enhanced features unsupported by the POS terminal are desired, the protocol converter can be programmed to convert data signals from the POS terminal into appropriate commands for accessing the enhanced features. (*Id.* at col. 5, lines 15-23). Thus, if a legacy device were replaced by a non-legacy device, the protocol converter would not convert data formats since the non-legacy and legacy devices are essentially the same except for the enhanced functionality of the non-legacy device.

In addition, the Fry patent makes no mention of replacing a legacy device with a non-legacy device. The peripherals are initially attached to the POS system and are configured by the protocol converter, which assigns device addresses and configures each device, allowing the POS terminal to recognize the devices. (*Id.* at col. 6, lines 47-52). Thus, the protocol converter ensures that the POS terminal is aware of the status of each device. Therefore, if a device were replaced, the protocol converter would configure the new device and update the device status of the old device to reflect the replacement. The protocol converter would not allow the POS terminal to communicate with the new device as if the new device were the old device.

Based on the reasons described above, it is respectfully submitted that the Fry patent neither discloses nor suggests “a transaction controller coupled to the protocol converter and the register device, the transaction controller operable to facilitate communication between the register device and the protocol converter when the first peripheral device replaces a second peripheral device communicating in a second data format that is incompatible with a first data format used by the first peripheral device, wherein the register device continues to transmit data to the first peripheral device using the second data format and the first peripheral device responds to the register device using the first data format,” as recited in claim 12 and that this claim is allowable. Because claims 13-26 and 29-30 depend from, and, therefore include the limitations of claim 12, it is respectfully submitted that these claims are also allowable.

Claim 31 recites limitations substantially similar to those of claim 12, including “operating a transaction controller remotely located from said register device and coupled to the protocol converter and the register device, the transaction controller operable to facilitate communication between the register device and the protocol converter when the first peripheral device replaces a second peripheral device communicating in a second data format that is incompatible with a first data format used by the first peripheral device, wherein the register device continues to transmit data to the first peripheral device using the second data format and the first peripheral device responds to the register device using the first data format.” Thus, it is respectfully submitted that claim 31 is allowable for at least the reasons described above with

reference to claim 12.

Claims 27 and 28 stand rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Pat. No. 6,415,341 to the Fry patent in view of <http://www.sun.com/jini> ("the Sun reference"). (See 2/23/06 Office Action, pp. 4-5).

It is respectfully submitted that the Sun reference does not cure the above described deficiencies of the Fry patent, and that neither the Fry patent nor the Sun reference, either alone or in combination, discloses or suggests "a transaction controller coupled to the protocol converter and the register device, the transaction controller operable to facilitate communication between the register device and the protocol converter when the first peripheral device replaces a second peripheral device communicating in a second data format that is incompatible with a first data format used by the first peripheral device, wherein the register device continues to transmit data to the first peripheral device using the second data format and the first peripheral device responds to the register device using the first data format," as recited in claim 12. Because claims 27 and 28 depend from, and, therefore include the limitations of claim 12, it is respectfully submitted that these claims are also allowable.

**CONCLUSION**

In light of the foregoing, Applicants respectfully submit that all of the pending claims are in condition for allowance. All issues raised by the Examiner having been addressed, and an early and favorable action on the merits is earnestly solicited.

Respectfully submitted,

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